

EXHIBIT F

From: [Cole Richter](#)
To: [Nima Hefazi](#); [Roberts, Clement](#); [Caridis, Alyssa](#); [Sonos-WDTX0881-service](#)
Cc: [QE-Sonos3](#); [Mao, Lillian J.](#)
Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Sonos prior art source code
Date: Wednesday, December 29, 2021 10:17:00 AM

Nima,

We continue to object to your request that Sonos produce multiple versions of its source code from several different time periods absent any articulation of relevance. However, I believe the parties can come to a compromise regarding outstanding source code production issues. We still await production of the YouTube TV source code. We also request production of source code for the YouTube Kids app as this product was identified and charted in Sonos's infringement contentions. And regarding Spotify, we have received your response that "Google does not have the source code for the Spotify app in its possession, custody or control" and that Spotify "has access to the publicly available materials and APIs." However, we did not request that Google produce the Spotify app source code, we requested that Google produce the "Google source code that was provided by Google to Spotify for use by the Spotify app or Google source code that is otherwise utilized by the Spotify app" (and related technical documentation). Google should be able to produce this information, even though Spotify may have had public access to various websites.

As a compromise, we would agree to produce two additional source code snapshots in accordance with your requests below, one prior to the earliest invention date for the '615 and '033 patents and one prior to the earliest invention date for the '885 and '966 patents.

Please let us know if Google is amenable to this compromise or if you think conferral on these issues will be productive.

Best,
Cole

From: Nima Hefazi <nimahefazi@quinnemanuel.com>
Sent: Monday, December 27, 2021 9:22 PM
To: Cole Richter <richter@ls3ip.com>; Roberts, Clement <croberts@orrick.com>; Caridis, Alyssa <acaridis@orrick.com>; Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>; Mao, Lillian J. <Imao@orrick.com>
Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Sonos prior art source code

Cole,

Following-up on this. Can you please let us know if Sonos will agree to make the code below available for inspection and when it will be made available.

Thank you,
Nima

From: Nima Hefazi

Sent: Wednesday, December 22, 2021 1:12 PM

To: Cole Richter <richter@ls3ip.com>; Roberts, Clement <croberts@orrick.com>; Caridis, Alyssa <acaridis@orrick.com>; Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>

Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>; Mao, Lillian J. <lmao@orrick.com>

Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Sonos prior art source code

Cole,

Following up on this. Please let us know if Sonos will agree to make the code below available for inspection and when it will be made available.

Thanks,
Nima

From: Nima Hefazi

Sent: Wednesday, December 15, 2021 2:31 PM

To: Cole Richter <richter@ls3ip.com>; Roberts, Clement <croberts@orrick.com>; Caridis, Alyssa <acaridis@orrick.com>; Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>

Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>; Mao, Lillian J. <lmao@orrick.com>

Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Sonos prior art source code

Cole,

I am following-up to see whether Sonos will agree to produce the prior art source code that Google has requested or if the parties are at an impasse such that we will need to raise this issue with the Court?

While we do not agree with your arguments that production of the requested code is “overly burdensome” or “not proportional to the needs of the case,” in the interest of compromise and to avoid burdening the Court with unnecessary discovery disputes, we suggest that Sonos begin by producing the versions of the Sonos prior art code (including the corresponding controller and Sonos application) immediately prior to its alleged invention date for the ‘615 and ‘033 patents (July 15, 2011) and the date of the earliest application Sonos claims priority to for these patents (December 30, 2011). Producing only the version from October 26, 2009 may exclude prior art functionality from 2009 to 2011 that is relevant to our invalidity contentions.

Similarly, for the ‘885 and ‘996 patents we similarly propose that the parties begin with Sonos producing versions that immediately predate Sonos’s alleged invention date and the earliest application Sonos claims priority to for these patents.

This compromise would be without prejudice to Google’s right to seek additional source code and versions, as necessary.

Let us know if this is agreeable to Sonos and when the code will be made available for inspection.

Thanks,
Nima

From: Cole Richter <richter@ls3ip.com>
Sent: Monday, November 22, 2021 10:07 AM
To: Nima Hefazi <nimahefazi@quinnemanuel.com>; Roberts, Clement <croberts@orrick.com>; Caridis, Alyssa <acaridis@orrick.com>; Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>; Mao, Lillian J. <lmiao@orrick.com>
Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Sonos prior art source code

[EXTERNAL EMAIL from richter@ls3ip.com]

Nima,

Attached is an email sent on October 26 noting that we've made "source code corresponding to the public release of the Sonos S5 player" available for inspection. I believe it is available for inspection in Orrick's Silicon Valley offices.

This code corresponds to the public release of the Sonos S5 player and was released Oct. 26, 2009. This code does not contain all "versions that were developed and/or deployed" between the three-year period you request below as that would be overly burdensome and not proportional to the needs of the case. For instance, would Google be willing to produce all "versions developed and/or deployed" of its source code for the accused products for the entire infringement period?

Regarding the "Sonos Digital Music system code that was developed and/or deployed between 2005 and 2007," again you are asking for all code that was "developed and/or deployed" between a three-year period. Depending on Google's definition of "version," this could result in many hundreds or even thousands of individual snapshots of the codebase. We are willing to meet and confer to understand what Google is looking for in this respect.

Regarding YouTube TV source code, my understanding is that Google has yet to make available for inspection any source code for the YouTube TV app (including backend source code to the extent that it differs from that of YouTube Music and YouTube). If that is incorrect, please let me know when this source code was made available for inspection and please let me the directories where this source code is located.

Regarding Spotify, we aren't asking Google to produce source code for the entire Spotify app. Rather, we are asking Google to produce its own materials (including source code) that it provided to Spotify, including "Google source code that was provided by Google to Spotify for use by the Spotify app or Google source code that is otherwise utilized by the Spotify app." That Sonos is pursuing a subpoena on third-party Spotify USA, Inc. and/or Letters Request on Spotify AB for other material does not excuse Google from its discovery obligations in this case.

Please confirm when Google will produce and/or make this material available for inspection.

Best,
Cole

From: Nima Hefazi <nimahefazi@quinnemanuel.com>
Sent: Friday, November 19, 2021 7:03 PM
To: Cole Richter <richter@ls3ip.com>; Roberts, Clement <croberts@orrick.com>; Caridis, Alyssa <acaridis@orrick.com>; Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Sonos prior art source code

Cole,

I don't recall seeing a notice from Sonos that it was making its prior art source code available for inspection (as opposed to notice that code was available pursuant to PLR 3-2). I apologize if I missed the notice. Would you mind pointing me to it and letting me know where the code is being made available?

Also, can you confirm that the "source code corresponding to the public release of the Sonos S5 player" that you refer to includes the versions that were developed and/or deployed between 2009 and December 30, 2011 (including source code for the Spotify integration). Additionally, you state that producing the Sonos Digital Music system code that was developed and/or deployed between 2005 and 2007 would "result in production of an excessive number of source code versions." Can you please let me know how many version are at issue, and the date of these versions so that we may consider Sonos's position. We can be available for a meet and confer on Tuesday or Wednesday of next week. Let us know some times that work for you.

In regards to your request for "YouTube TV" source code, can you please let us know what exactly you believe is missing so that we can investigate? Further, as you know, the Spotify application is a third party application that is released by third-party Spotify. Indeed, we understand that Sonos has served a subpoena on Spotify for its source code.

Thanks,
Nima

From: Cole Richter <richter@ls3ip.com>
Sent: Wednesday, November 17, 2021 1:02 PM
To: Nima Hefazi <nimahefazi@quinnemanuel.com>; Roberts, Clement <croberts@orrick.com>; Caridis, Alyssa <acaridis@orrick.com>; Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Sonos prior art source code

[EXTERNAL EMAIL from richter@ls3ip.com]

Nima,

We've already made available for inspection source code corresponding to the public release of the Sonos S5 player. Regarding source code corresponding to "the Sonos Digital Music System that was developed and/or deployed between 2005 and 2007," we've objected to such production for at least the reason that it is overly burdensome and not proportional to the needs of the case since it would result in production of an excessive number of source code versions. We stated that we are willing to meet and confer to understand precisely what is sought.

As long as we are on the subject, Sonos requests (again) that Google make available for inspection source code for YouTube TV, as well as Google source code that was provided by Google to Spotify for use by the Spotify app or Google source code that is otherwise utilized by the Spotify app. These are responsive to at least Sonos's RFP Nos. 1, 14, 15, 20.

Please confirm by the end of the week that Google will make this code available for inspection.

Best,
Cole

From: Nima Hefazi <nimahefazi@quinnemanuel.com>

Sent: Wednesday, November 17, 2021 1:10 PM

To: Cole Richter <richter@ls3ip.com>; Roberts, Clement <croberts@orrick.com>; Caridis, Alyssa <acaridis@orrick.com>; Sonos-WDTX0881-service <Sonos-WDTX0881-service@orrick.com>

Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>

Subject: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Sonos prior art source code

Counsel,

Google requests that Sonos make available for inspection source code for the prior art products charted in Google September 10, 2021 Invalidity Contentions, including versions of source code for (1) the Sonos S5 system (including its Spotify integration) that were developed and/or deployed between 2009 and December 30, 2011 and (2) the Sonos Digital Music System that was developed and/or deployed between 2005 and 2007. This source code is responsive to at least Google's RFP Nos. 5-7.

Please confirm by the end of the week that Sonos will make this code available at Orrick's offices in Menlo Park and Los Angeles, and the date by which the source code will be made available.

Thank you,
Nima